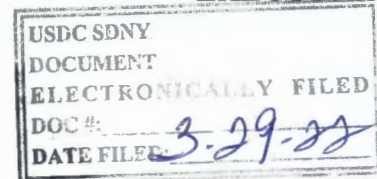


EXECUTION COPY



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF THE  
KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX REFUND  
SCHEME LITIGATION

This document relates to case no. 18-cv-09505.

MASTER DOCKET

18-md-2865 (LAK)

**PROPOSED CONSENT JUDGMENT AND STIPULATION OF  
DISMISSAL WITH PREJUDICE**

WHEREAS, on June 14, 2018, plaintiff Skatteforvaltningen (“SKAT”) commenced this action against defendants SV Holdings, LLC Retirement Plan (“SV Holdings”), and Stephanie Tew, and on April 24, 2020, SKAT filed an amended complaint against the defendants (the foregoing collectively hereinafter referred to as the “Action”);

WHEREAS, SKAT and defendants SV Holdings and Stephanie Tew now wish to resolve all the claims SKAT asserted in the Action against SV Holdings and Stephanie Tew;

NOW THEREFORE, without trial or adjudication of issue of fact or law, and upon SV Holdings’ and Stephanie Tew’s consent, the Court finds that there is good and sufficient cause to enter this Consent Judgment, and that IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED THAT:

1. This Consent Judgment is hereby entered in favor of plaintiff SKAT against defendant SV Holdings in the amount of \$2,243,000 (US); and
2. Each party shall bear its own attorneys’ fees and costs.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Consent Judgment.

**EXECUTION COPY**

IT IS FURTHER HEREBY STIPULATED AND AGREED by and between the parties and their respective counsel that the above-captioned action is voluntarily dismissed, with prejudice, against defendant Stephanie Tew pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), with each party bearing its own attorneys' fees, costs, and expenses.

Dated: New York, New York  
June 7, 2021

By: 

HUGHES HUBBARD & REED LLP

Marc A. Weinstein

Neil J. Oxford

Dustin P. Smith

One Battery Park Plaza

New York, New York 10004-1482

Telephone: (212) 837-6000

Fax: (212) 422-4726

marc.weinstein@hugheshubbard.com

neil.oxford@hugheshubbard.com

dustin.smith@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen  
(Customs and Tax Administration of the  
Kingdom of Denmark)*

By: \_\_\_\_\_

SEWARD & KISSEL LLP

Mark J. Hyland

Thomas Ross Hooper

One Battery Park Plaza

New York, New York 10004

Tel: (212) 574-1200

Fax: (212) 480-8421

hyland@sewkis.com

hooper@sewkis.com

*Counsel for Stephanie Tew and SV Holdings,  
LLC Retirement Plan*

SO ORDERED:

\_\_\_\_\_  
Lewis A. Kaplan

United States District Judge

IT IS FURTHER HEREBY STIPULATED AND AGREED by and between the parties and their respective counsel that the above-captioned action is voluntarily dismissed, with prejudice, against defendant Stephanie Tew pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), with each party bearing its own attorneys' fees, costs, and expenses.

Dated: New York, New York  
June 7, 2021

By: \_\_\_\_\_

HUGHES HUBBARD & REED LLP  
Marc A. Weinstein  
Neil J. Oxford  
Dustin P. Smith  
One Battery Park Plaza  
New York, New York 10004-1482  
Telephone: (212) 837-6000  
Fax: (212) 422-4726  
marc.weinstein@hugheshubbard.com  
neil.oxford@hugheshubbard.com  
dustin.smith@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen  
(Customs and Tax Administration of the  
Kingdom of Denmark)*

By: Mark J. Hyland

SEWARD & KISSEL LLP  
Mark J. Hyland  
Thomas Ross Hooper  
One Battery Park Plaza  
New York, New York 10004  
Tel: (212) 574-1200  
Fax: (212) 480-8421  
hyland@sewkis.com  
hooper@sewkis.com

*Counsel for Stephanie Tew and SV Holdings,  
LLC Retirement Plan*

SO ORDERED:

Lewis A. Kaplan  
United States District Judge

3/29/22